

EXHIBIT P

DECLARATION OF DR. MICHAEL R. GRAY

1. I am a licensed medical doctor in the State of Arizona. I have attached my curriculum vitae to this Declaration as Appendix A.

2. I have over 49 years of experience in internal medicine, occupational medicine and toxicology. My top areas of expertise are chronic inflammatory response syndrome (CIRS), neurotoxicity syndromes, relapsing multiple sclerosis (RMS), and fungal arthritis. I specialize in internal medicine and toxicology.

3. I am an expert on mold exposure and have done case studies and publications on Mycotoxins, Mold and Fungus.

4. My research has been conducted in Clinical Environment Toxicology.

5. I have devoted my medical career to internal medicine and toxicology.

6. I have been retained for my expertise on mold exposure, Mycotoxins and the affect of mold exposure suffered by Kenan and Dylan Kahraman.

7. My opinion has been informed by my decades of relevant experience and by reviewing the documents below:

8. I have reviewed the follow documents:

- a. MoldEx Mold Report 4/12/2019 with Aerobiology & Laboratory Associates Certificate of Analysis.
- b. Everclear Environmental Solutions Mold Remediation Invoice dated 5/8/2019 and photographs.
- c. Southwest Environmental Microbiology Laboratories Report dated 5/6/2019

- d. Southwest Environmental Microbiology Laboratories Report dated 5/16/2019
- e. Southwest Environmental Microbiology Laboratories Report dated 5/29/2019
- f. Southwest Environmental Microbiology Laboratories Report dated 6/11/2019
- g. Mold Inspection & Testing (MI&T) Report dated 5/27/2019.
- h. The Great Plains Laboratory, LLC MycoTox Profile for K dated February 20, 2023.
- i. The Great Plains Laboratory, LLC MycoTox Profile for D K dated February 20, 2023.
- j. The Great Plains Laboratory, LLC MycoTox Profile for Jessica Kahraman.
- k. July 26, 2019 Jodi Carter M.D. FAAP, Phoenix Children's Hospital letter re K K
- l. July 26, 2019 Jodi Carter, M.D., FAAP, Phoenix Children's Hospital letter re D K
- m. D and K K medical records from Advanced Neurological Rehabilitation.
- n. E and K K Care Labs reports.
- o. K K Phoenix Children's Hospital Records for 2018 and 2020.
- p. April 22, 2019 Email from Suzanne Nichols requesting mold testing on the boys.
- q. June 6, 2019 Email from Attorney General Kathleen Martoncik denying the request for testing.

r. Additional Lab Reports for K

9. In 2019, the Kahraman home located at Mesa, Arizona, mold testing results show the home contained high levels of penicillium/Aspergillus and Chaetomium within multiple areas of the walls and ceiling surrounding the children's bedroom and bathroom as well as the air within the home.

See Appendix B.

10. The Great Plains Laboratory, LLC's MycoTox profile for Kenan Kahraman collected on February 20, 2023, revealed that he still has an abnormal range of Ochratoxin A (Aspergillus) and Citrinin (multiple mold species). As reported, Ochratoxin A(OTA) is a nephrotoxic, immunotoxin and carcinogenic mycotoxin. **See Appendix C.**

11. The Great Plains Laboratory, LLC MycoTox profile for Dylan Kahraman collected on February 20, 2023, revealed a high amounts of Ochratoxin A (Aspergillus) and Citrinin (multiple mold species). **See Appendix D.**

12. The Great Plains Laboratory, LLC MycoTox profile for Jessica Kahraman collected on May 14, 2019 revealed positive results for Aflatoxin-MI (Aspergillus), Ochratoxin A (Aspergillus), and Mycophenolic Acid (Penicillium) and multiple mold species (Citrinin).

13. It is my opinion that both K and I K were exposed to mycotoxins due to the exposure within the contaminated home.

14. Both K and D Kε suffered from Mycotoxicosis due to their mold exposure.

15. Both boys should have been tested once the State learned of the mold exposure.

16. The mold exposure contributed to inflammation, muscle problems, intolerances and food sensitivities.

17. It is my opinion that Kε and L medical issues were a result of mold exposure and not severe malnutrition.

18. Both K and L symptoms began to improve once they were no longer living in a water damaged mold infested home.

19. Review of both K and L lab reports show their protein levels were within normal limits and they did not suffer from malnutrition; they were myotoxic. See Appendix E.

20. These are my preliminary opinions and may supplement once I have the opportunity to review additional documentation.

I declare under penalty of perjury that the foregoing is true and correct.

Michael R. Gray, M.D., M.P.H., C.I.M.E.

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Declaration of Dr. Gray

Final Audit Report

2023-08-01

Created:	2023-08-01
By:	Jenny Jansch (jjansch@gillaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAdVXAQJpNKJ5ZyEriOeuc_-9hoRLDxfpx

"Declaration of Dr. Gray" History

-  Document created by Jenny Jansch (jjansch@gillaw.com)
2023-08-01 - 11:12:12 PM GMT
-  Document emailed to mgray@phgaz.com for signature
2023-08-01 - 11:12:49 PM GMT
-  Email viewed by mgray@phgaz.com
2023-08-01 - 11:13:22 PM GMT
-  Signer mgray@phgaz.com entered name at signing as Michael Gray
2023-08-01 - 11:15:48 PM GMT
-  Document e-signed by Michael Gray (mgray@phgaz.com)
Signature Date: 2023-08-01 - 11:15:50 PM GMT - Time Source: server
-  Agreement completed.
2023-08-01 - 11:15:50 PM GMT